

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

JMK 3, LLC, an Ohio limited liability company,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 20-CV-1-J
	)	
THE GENEUS GROUP, LLC, a Wyoming	)	
limited liability company,	)	
	)	
Defendant.	)	

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**AFFIDAVIT OF CHARLES KASBEE IN SUPPORT OF DEFAULT JUDGMENT**

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I, Charles Kasbee, being duly sworn, state as follows:

1. I am an adult and competent to make this Affidavit.
2. All facts herein positively alleged are within Affiant's personal knowledge.
3. I am currently, and was at all relevant times, an owner and manager of Plaintiff JMK3, LLC ("JMK3"). I am authorized to make this Affidavit on behalf of JMK3.
4. Defendant The Geneus Group, LLC ("Geneus Group") is indebted to JMK3 pursuant to an oral and written contract with JMK3 (collectively the "Contract") for services rendered during July, August and September of 2019 as described in the Complaint filed in this matter.
5. The principal amount due and owing by Geneus Group for services rendered by JMK3 pursuant to the Contract totals One Million, Nine Hundred Fifty-Nine Thousand, Six Hundred Seventy-Seven Dollars and Forty-Two Cents (\$1,959,677.42), only a portion of which could be invoiced by JMK3 before Geneus Group terminated the Contract. A copy of the one

invoice sent to Geneus Group prior to termination of the Contract and refusal to pay by Geneus Group is attached hereto as Exhibit "A".

6. In this lawsuit, JMK3 has incurred costs in the amount of Four Hundred Seventy Dollars (\$470.00).

7. JMK3 is entitled to recover judgment in the amount of One Million, Nine Hundred Fifty-Nine Thousand, Six Hundred Seventy-Seven Dollars and Forty-Two Cents (\$1,959,677.42), plus costs totalling Four Hundred Seventy Dollars (\$470.00), as well as post-judgment interest from the date of judgment until satisfaction.

DATED this 4<sup>th</sup> day of March, 2020.

JMK3, LLC

By: 

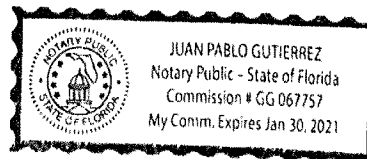
Charles Kasbee, Member/Manager

STATE OF FLORIDA       )  
  )ss  
COUNTY OF Palm Beach

SUBSCRIBED and SWORN to before me this 4 day of March, 2020, by Charles Kasbee, member and manager of JMK3, LLC.

  
Notary Public

My commission expires: Jan 30, 2021



JMK3, LLC  
 631 US HWY ONE, Suite 101-B  
 North Palm Beach, FL 33408  
 Attn: Chuck Kasbee



INVOICE NO. 1

9-15-19

## BILL TO

The Geneus Group, LLC  
 Attn: Scott Seedall  
 PO Box 12170  
 Jackson, Wyoming 83002  
 Telephone: 307-203-7832

## SHIP TO

## INSTRUCTIONS

Please Wire funds: Banking instructions were sent in previous e-mail.

## QUANTITY

## DESCRIPTION

## UNIT PRICE

## TOTAL

July Marketing

\$330,000.00

• Marketing and brand awareness services to include, but not be limited to: patient outreach, brand development, brand awareness, marketing

• Logistics management services to include, but not be limited to: coordination of mailing / shipping addresses of patients who desire diagnostic testing services, coordination and facilitation of patient scheduling for physician consultations, coordination of updates to patients regarding diagnostic testing status and any necessary re-tests

EXHIBIT

A

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